

MEMORANDUM

TO: Thomas C. McMahon, Director, DWPC

FROM: Richard Tomczyk, Associate Environmentalist, Planning and Technical Section, DWPC *Richard Tomczyk*

DATE: June 2, 1983

SUBJECT: New Bedford, Remedial Action Master Plan, Final Report, May 1, 1983

I have reviewed the referenced report and wish to submit the following comments. The Final Report has adopted some of the comments DEQE submitted on March 15, 1983 relative to the Draft Report. Other comments were not addressed. Recommendations that were addressed include:

1. The report cites E.P.A. as the lead agency, who will manage and coordinate the master plan. This is consistent with DEQE'S request.
2. Hot spot dredging and ambient air testing and monitoring are scheduled to begin in the summer of 1983.
3. The statement of objectives has been amended to include our recommendations. The statement of objectives now includes provisions for the protection of the environment, identifies the need to clean up PCB impacted areas as it relates to commercial fishing, allows for maintenance and development dredging projects, and addresses recreational potential for fishing and lobstering within the harbor.
4. Research pertaining to detoxification of PCB contaminated sediments and PCB disposal will be covered in the feasibility study (development of alternatives).
5. The aquifer in the vicinity of the New Bedford landfill is no longer referred to as being artesian.
6. The data which was referred to in the draft as being of "little value" is no longer considered as such in the final.
7. Unconventional remedial alternatives will be covered in the feasibility study. All alternatives will be screened including upland, in harbor, and ocean disposal.

8. Clarks Cove has been given more attention in the final report than in the draft.

9. The wastewater system investigation that was carried out by Rick Dunn, DWPC Technical Services Branch has been recognized by the final report. Therefore, the scope of activities for wastewater system investigations have revised.

Recommendations of DEQE that appear to have been omitted include:

1. A strong statement on the need to prioritize disposal site investigations. It is true, however, that disposal alternatives will begin immediately. This will be carried out in conjunction with hot spot remedial action and the feasibility study but apparently not prior to these as DEQE suggested.

2. Health studies remain absent from the RAMP. The recommendation, of the RAMP final report is that health studies be conducted independently, without RAMP funds.

3. DEQE had requested that the Evaluation of Technical Feasibility and Institutional Constraints of Remedial Alternatives be completed in less than two years. The final report has provided two years for this project as the draft report did.

4. DEQE recommended that the reference to "solid" PCB wastes in the sanitary landfill be corrected to "liquid" PCB wastes. This has not been done.

5. It does not appear that the final report has provided measures to assure that the subsurface peat layer at the sanitary landfill will not be punctured during subsurface investigations. Disturbance of the peat layer may result in migration of PCB wastes from the landfill to the underlying aquifer. Provisions must be made to see that this does not occur during any activities at the landfill.

6. No specific recommendations for chemical elutriate tests were provided in the report. This will be important when regulatory agencies begin to evaluate the consequences of the proposed remedial action for disposal of dredged material.

Other comments relative to the final report include:

1. The objectives of the remedial action have been qualified as to their feasibility, however, a definition of feasibility has not been given. What type of parameters will be used to determine if a feasible alternative exists to restore the recreational use of the harbor?

2. Input to the feasibility study should be solicited from federal agencies (U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, National Marine Fisheries Service) as well as from state and local agencies.

3. A contact person (or agency) who will receive new data for the data management task needs to be identified.

4. In discussing the environment of the estuary, the report states that certain data (prior to 1980) were not included since the nature of the environment has "changed". What could have possibly changed in such a short period of time in this highly altered and anthropogenic estuary?

5. While provisions in the report have been made for additional sediment investigations in Clarks Cove, no provisions for water or biota studies were included. These should be provided.

6. Methods of proper soil, water, and biota sample preservation must be described and approved to ensure that the integrity of the sample is not affected and that results from fresh samples will be comparable to those samples preserved for future analysis and reference.

7. It is not clear if industrial records, landfill records, private waste handler records, and shipping manifests will be used to disclose past PCB disposal practices at the New Bedford Sanitary Landfill and Sullivans Ledge as well as at undisclosed sources and sites.

8. Is the West Island dredge material disposal site an open water site or a land site? I only know of the open water site located off shore of West Island.

9. Two additional sites that might have PCB contaminated dredge material are Fairhaven Marina and the Mederois Bus Lines property (wetland fill areas) located on the Fairhaven side of the Acushnet River.

10. The list of contaminants to be investigated in Project Work Statement 007 under the draft report was Cu, Cr, Zn, Pb, As, Ag, Cd, and Hg. The final report lists only Cu, Cr, and Zn. Why were the others deleted?

11. Are the metal contaminants to be included in the Food Web Model of Project Work Statement 007?

12. Who will bear the expense of removing the PCB hot spot near the Aerouox facility in the Acushnet River?

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13. What recent changes in policy initiatives governing Federal restrictions to ocean disposal are referred to on page A-36 of the final report?

14. The Massachusetts Clean Waters Act of 1966, MGL Ch.21, sec. 26-53 needs to be included under Project Work Statement 010, Identification of Permit Requirements.

15. It should be noted that the Division of Water Pollution Control also regulates dredged material disposal in waters of the Commonwealth.